



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

May 19, 2020

By ECF

The Honorable Sidney H. Stein
United States District Judge
500 Pearl Street
Southern District of New York
New York, New York 10007

**Re: United States v. Ruless Pierre,
19 Cr. 783 (SHS)**

Dear Judge Stein:

The Government writes, with the consent of defense counsel Brooke Cucinella, regarding the proposed schedule. In light of the current pandemic and Chief Judge McMahon's April 20, 2020 standing order suspending jury trials until further order of the court, the Government respectfully requests that the trial date be adjourned and that pre-trial filing deadlines be modified. The parties propose that the Court schedule a trial date in September, with the following schedule for pre-trial filings:¹

- Motions *in limine*, requests to charge and proposed voir dire shall be due three weeks before trial.
- Responses to any motions *in limine* shall be due two weeks before trial.

The Government has also agreed to produce witness statements pursuant to 18 U.S.C. § 3500 30 days before trial, in light of counsel's agreement to enter into stipulations regarding the authenticity of standard business records (such as bank and phone records) and other records

¹ This schedule is consistent with the original schedule set by the Court in February, which set the deadline for motions *in limine*, requests to charge, and proposed voir dire for three weeks before trial.

that would otherwise require calling a witness merely to establish authenticity.

Respectfully submitted,

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by: _____/s/_____
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cc: Counsel for Rules Pierre (by ECF)